

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHELSEY GOSSE, *on her own behalf  
and on behalf of other persons similarly  
situated,*

Plaintiffs

v.

TRANSWORLD SYSTEMS, INC.; U.S.  
BANK, NA.; RATCHFORD LAW  
GROUP, P.C.; NATIONAL  
COLLEGIATE STUDENT LOAN  
TRUST 2007-3,

Defendants

Civil Action No. 3:20-cv-01446-RDM

Hon. Robert D. Mariani

Electronically Filed

**NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2007-3'S MOTION TO DISMISS**

Defendant National Collegiate Student Loan Trust 2007-3

("National") moves to dismiss Plaintiff's Complaint for failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6). Plaintiff's claim against National is based on the Unfair Trade Practices Consumer Protection Law but Plaintiff does not, and cannot, plead facts to state a claim. Plaintiff cannot plead facts to show that she justifiably relied on National's alleged conduct or representation and that she suffered harm as a result of that reliance. To the extent Plaintiff asserts any other claims against National, they

similarly fail. National will file its Brief in Support within 14 days pursuant to Local Rule 7.5.

Respectfully submitted,

Dated: October 26, 2020

By: /s/ Justin G. Weber

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Student Loan Trust 2007-3*

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1**

Defendant National Collegiate Student Loan Trust 2007-3's counsel requested Plaintiff's concurrence in the relief requested in this Motion. Plaintiff's counsel does not concur in the relief requested.

/s/ Justin G. Weber